

EXHIBIT 19

JENNIFER POWERS - 10/16/2018

1

2 UNITED STATES DISTRICT COURT

3 EASTERN DISTRICT OF NEW YORK

4 -----x

5 HILLARY LAWSON, KRISTINA HALLMAN,
6 STEPHANIE CALDWELL, MOIRA HATHAWAY,
MACEY SPEIGHT, ROSEMARIE PETERSON,
and LAUREN FULLER,

7

Plaintiffs,

8

-against-

Case No. 1:17-cv-06404

9

10 HOWARD RUBIN, JENNIFER POWERS,
and the DOE COMPANY,

11

Defendants.

12

-----x

13

October 16, 2018
10:07 a.m.

14

15 Videotaped Deposition of JENNIFER
16 POWERS, taken by Plaintiffs, pursuant to
17 Notice, at the offices of Balestriere
18 Fariello, 225 Broadway, New York, New
19 York, before ERIC J. FINZ, a Shorthand
20 Reporter and Notary Public within and for
21 the State of New York.

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[illegible][illegible]

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2 A. I believe so.

3 Q. What about [REDACTED]?

4 A. Yes.

5 Q. [REDACTED], do you know if

6 she did?

7 A. Yes.

8 Q. What about [REDACTED], do

9 you know if she did?

10 A. I believe so.

11 Q. [REDACTED], did she

12 signed a nondisclosure agreement?

13 A. I believe so, yes.

14 Q. What about [REDACTED]?

15 A. Yes.

16 Q. And [REDACTED]?

17 A. Yes.

18 Q. Were you ever present when any

19 of the women we just discussed signed

20 these nondisclosure agreements?

21 A. Yes.

22 Q. Where did they sign them?

23 A. In the condo, in the

24 apartment.

25 Q. Did everyone we just discussed

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2 sign the nondisclosure agreement in the

3 apartment?

4 A. I believe so.

5 Q. Was there anywhere else that

6 they signed them, to your knowledge?

7 A. Not to my knowledge.

8 Q. But I guess I'm not sure, do

9 you think that they might have? I'm not

10 sure if I understand what your

11 recollection is, forgive me.

12 A. No, no, I'm sorry.

13 Q. That's okay.

14 A. I always signed the release

15 with them. So being that it was me that

16 always was with them when they signed the

17 release, I usually met them at the

18 apartment. And that's where we signed.

19 Q. So you always signed the

20 nondisclosure agreements with the women

21 that we've been discussing. Correct?

22 A. I always discussed it with

23 them and made sure that they knew what

24 they were signing, yes.

25 Q. Okay. But I understand you're

<p style="text-align: right;">Page 118</p> <p>1 JENNIFER POWERS</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">Page 120</p> <p>1 JENNIFER POWERS</p> <p>2 besides you and the actual signers of the</p> <p>3 release, was anyone else present?</p> <p>4 A. No.</p> <p>5 Q. Was anyone else present in the</p> <p>6 apartment at all when you were signing</p> <p>7 the release -- withdrawn.</p> <p>8 I'll ask again.</p> <p>9 When you were in the apartment</p> <p>10 with the women we've been discussing</p> <p>11 signing the releases, was anyone else</p> <p>12 present anywhere else in the apartment?</p> <p>13 A. No, sir.</p> <p>14 MR. BALESTRIERE: Do you want</p> <p>15 to take a break?</p> <p>16 THE WITNESS: Why, do I look</p> <p>17 like I need a break?</p> <p>18 MR. BALESTRIERE: I'm ready to</p> <p>19 keep going if you are.</p> <p>20 THE WITNESS: I'm good.</p> <p>21 Q. What kinds of questions, I'm</p> <p>22 just going to go through the different</p> <p>23 plaintiffs here, did Ms. [REDACTED] ask you</p> <p>24 about the release?</p> <p>25 A. [REDACTED] didn't have any questions.</p>
<p style="text-align: right;">Page 119</p> <p>1 JENNIFER POWERS</p> <p>2 Q. And you were always present</p> <p>3 with them at the apartment when they</p> <p>4 signed these releases. Right?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Who, if anyone else, was</p> <p>7 present when they signed these releases?</p> <p>8 A. Well, in [REDACTED] case, when she</p> <p>9 brought a friend, that other person would</p> <p>10 be there as well.</p> <p>11 Q. Who are we talking about a</p> <p>12 friend?</p> <p>13 A. [REDACTED]. So then it would</p> <p>14 be [REDACTED] and I signing -- and going</p> <p>15 over the same release, executing it.</p> <p>16 Q. And you were the only ones</p> <p>17 there during at least when Ms. [REDACTED]</p> <p>18 signed it. Is that correct?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Was Mr. Rubin ever</p> <p>21 present when you were with the women</p> <p>22 we've been discussing and they signed the</p> <p>23 releases?</p> <p>24 A. No.</p> <p>25 Q. What about anyone else really,</p>	<p style="text-align: right;">Page 121</p> <p>1 JENNIFER POWERS</p> <p>2 She actually was very knowledgeable about</p> <p>3 the release. She understood that she</p> <p>4 would be signing a release, I didn't hit</p> <p>5 her with a ton of bricks. She wasn't</p> <p>6 surprised. And she had no questions for</p> <p>7 me in regards to that release.</p> <p>8 Q. How did she know she'd be</p> <p>9 signing the release?</p> <p>10 A. I assumed that [REDACTED] told</p> <p>11 her.</p> <p>12 Q. Was [REDACTED] present when</p> <p>13 Ms. [REDACTED] signed the release?</p> <p>14 A. No.</p> <p>15 Q. What about Ms. [REDACTED], when she</p> <p>16 signed what we're calling the release,</p> <p>17 did she have any questions for you?</p> <p>18 A. She did not have any</p> <p>19 questions. And in fact, both the women,</p> <p>20 they initialled each little paragraph,</p> <p>21 and that was my checks and balances to</p> <p>22 know, to kind of follow along with how</p> <p>23 they were reading and where they were in</p> <p>24 the particular document. Just for me to</p> <p>25 follow along in case a question were to</p>

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Release," production numbers HR 473 through HR 474.)

BY MR. BALESTRIERE:

Q. I'm showing you what I've just marked Powers 5. This is for Ms. [REDACTED]. Can you look at the second page of that, Powers 5.

You secured Ms. [REDACTED] signature on Powers 5, this confidentiality agreement and release, on October 12, 2015. Right?

A. Yes.

Q. How long did you take with her when working on this?

A. Same amount of time, ten, fifteen minutes.

Q. And you asked her to put her signature -- excuse me. You asked her to put her initials by each paragraph on Powers 5. Correct?

A. Yes, it was my way of following along with her in my head as to where she was in the document reading.

Q. Thank you. You can set that

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